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UNITED STATES BANKRUPTCY COURT
SAN FRANCISCO, CA

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Attorneys for International Business Machines Corp.

UNITED STATES BANKRUPTCY COURT NORTHERN DISTRICT OF CALIFORNIA

SAN FRANCISCO DIVISION

| In re: | : Case No. | 19-30088 (DM) |
|---------------------------------------|--------------|---------------|
| PG&E CORPORATION, | : Chapter 11 | |
| Debtor. | : : • | |
| In re: | : Case No. | 19-30089 (DM) |
| PACIFIC GAS AND ELECTRIC COMPANY, | : Chapter 11 | |
| Debtor. | · : | |
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NOTICE OF APPEARANCE AND REQUEST FOR NOTICE AND DOCUMENTS

PLEASE TAKE NOTICE that, the undersigned hereby appears as counsel for International Business Machines Corp. ("IBM"), a party in interest herein under 11 U.S.C. § 1109(b), in the above-captioned cases. Such counsel hereby enters its appearance, pursuant to 11 U.S.C. § 1109(b) and Federal Rule of Bankruptcy Procedure 9010, and, pursuant to 11 U.S.C. §§ 102(1) and 342, and Federal Rules of Bankruptcy

Procedure 2002, 3017 and 9007, requests that copies of all notices or pleadings filed, given or required to be given in this case, and all papers served or required to be served in this case, be delivered to and served upon the undersigned at the following offices, post office addresses, email addresses, fax and telephone numbers:

Christopher R. Belmonte, Esq. Pamela A. Bosswick, Esq. Satterlee Stephens LLP 230 Park Avenue New York, New York 10169 Tel: (212) 818-9200

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PLEASE TAKE FURTHER NOTICE that, the foregoing request includes not only notices and papers referred to in the Federal Rules of Bankruptcy Procedure specified above but also includes, without limitation, all other notices, papers, reports, orders, agenda letters, applications, motions, petitions, pleadings, requests, complaints or demands, statements of affairs, operating reports, schedules of assets and liabilities, whether formal or informal, whether written or oral, and whether transmitted or conveyed by mail, hand delivery, telephone, telegraph, telex or otherwise, which affects the Debtors or the property of the Debtors.

PLEASE TAKE FURTHER NOTICE that, pursuant to Federal Rule of Bankruptcy Procedure 3017(a), IBM requests that its counsel be provided with copies of any disclosure statements and plans of reorganization.

This Notice of Appearance and Request for Notice and Documents shall not be deemed or construed to be a waiver of the rights of IBM to (i) have final orders in non-core matters entered only after *de novo* review by a District Judge, (ii) trial by jury in

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any proceeding so triable in this case or any case, controversy, or proceeding related to this case, (iii) have the District Court or the Bankruptcy Court abstain from hearing any matter subject to such abstention, (iv) have the District Court withdraw the reference in any matters subject to such withdrawal, or (v) any other rights, claims, set-offs, or recoupments to which it may be entitled, which rights it expressly reserves.

Dated: New York, New York January 31, 2019

SATTERLEE STEPHENS LLP

Attorneys for IBM

Bv:

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DECLARATION OF SERVICE

Christopher R. Belmonte, declares:

- 1. I am a partner of Satterlee Stephens LLP which represents International Business Machines Corp. ("IBM"). I am a citizen of the United States, over the age of 18, and competent to make this Declaration.
- 2. On or about January 31, 2019, I caused to be filed the Notice of Appearance and Request for Notice and Documents on behalf of IBM with the Clerk of the court.
- 3. In addition, on January 31, 2019, I caused to be served the foregoing document via U.S. Mail upon the persons listed below:

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I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

DATED this 31st day of January, 2019, at New York, New York.

By:

Christopher R. Belmonte

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